

Opposition Date: October 14, 2014 at 11:59 p.m. (Prevailing Eastern Time)
Reply Date: October 21, 2014 at 11:59 p.m. (Prevailing Eastern Time)

JONES DAY

Jayant W. Tambe
Laura W. Sawyer
222 East 41st Street
New York, New York 10017

Attorneys for the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X

In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.	:	Case No. 08-13555 (SCC)
Debtors.	:	(Jointly Administered)

----- X

**NOTICE OF LEHMAN'S MOTION FOR AN ORDER EXCLUDING THE TESTIMONY
OF DANIEL CURRY AND JEFFREY HASTEROK**

PLEASE TAKE NOTICE that upon the *Memorandum of Law in Support of Lehman's Motion For An Order Excluding The Testimony of Daniel Curry and Jeffrey Hasterok*, dated September 26, 2014, the *Declaration of Laura W. Sawyer in Support of Lehman's Motion For An Order Excluding The Testimony of Daniel Curry and Jeffrey Hasterok*, dated September 26, 2014, and the exhibits attached thereto, and all prior proceedings relating to Claims Nos. 37355 and 37356, Lehman Brothers Holdings Inc. ("LBHI") and Lehman Brothers Special Financing Inc. ("LBSF") (collectively "Lehman"), hereby move this Court for entry of an order excluding the testimony of Daniel Curry and Jeffrey Hasterok, two expert witnesses proffered by the Tobacco Settlement Authority of the State of Washington ("Washington TSA") in support of its Claims Nos. 37355 and 37356.

PLEASE TAKE FURTHER NOTICE that any opposition to the relief sought herein must be made in writing, conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors*, to be filed electronically by registered users of the Bankruptcy Court's electronic case filing system, and be served, so as to be received no later than **October 14, 2014 at 11:59 p.m. (Prevailing Eastern Time)**, upon counsel to the Debtors, Jones Day, 222 East 41st Street, New York, NY 10017 (Attention: Jayant W. Tambe and Laura W. Sawyer).

PLEASE TAKE FURTHER NOTICE that if you do not timely file and serve a written objection to the relief requested in the Motion, the Bankruptcy Court may deem any opposition waived, treat the Motion as conceded, and enter an order granting the relief requested in the motion without further notice or hearing.

Dated: September 26, 2014
New York, New York

Respectfully submitted,

/s/ Laura W. Sawyer

JONES DAY

Jayant W. Tambe

Laura W. Sawyer

222 East 41st Street

New York, New York 10017

Telephone: (212) 326-3685

Facsimile: (212) 755-7306

Attorneys for the Debtors

DECLARATION OF SERVICE

Laura W. Sawyer declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that on September 26, 2014, I caused a true and correct copy of the attached Notice Of Lehman's Motion For An Order Excluding The Testimony Of Daniel Curry and Jeffrey Hasterok to be served by first class mail and via the Southern District of New York Bankruptcy Court's electronic case filing system upon the following counsel of record:

Paul J. Lawrence
Kymberly K. Evanson
PACIFICA LAW GROUP LLP
1191 Second Avenue, Suite 2100
Seattle, WA 98101

Eric T. Moser
Robert N. Michaelson
RICH MICHAELSON MAGALIFF MOSER, LLP
340 Madison Avenue, 19th Floor
New York, NY 10173

/s/ Laura W. Sawyer
Laura W. Sawyer